

In the Matter Of:

Stacy L. Randall v. Reed C. Widen, et al.

Deposition of William B. Nordland

January 04, 2024

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**Stacy L. Randall v.
Reed C. Widen, et al.**

**Deposition of William B. Nordland
January 04, 2024**

<p>UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN</p> <hr/> <p>STACY L. RANDALL, Plaintiff, -vs- Case No. 3:22-cv-00400-jdp REED C. WIDEN, MICHAEL KIESLER, WIDEN ENTERPRISES, LLC, and WINDY WATERS, INC., Defendants.</p> <hr/> <p>Deposition of WILLIAM B. NORDLAND, taken at the instance of the Plaintiff, under and pursuant to Subpoena, before Sheila K. Finnegan-Martinez, RPR, a Notary Public in and for the State of Wisconsin, at Reinhart Boerner Van Deuren S.C., located at 1000 North Water Street, Suite 1700, Milwaukee, Wisconsin, on January 4, 2024, commencing at 9:32 a.m. and concluding at 10:29 a.m.</p>	<p style="text-align: right;">Page 3</p> <p>1 WILLIAM B. NORDLAND, called as a 2 witness, being first duly sworn, testified on 3 oath as follows: 4 5 EXAMINATION 6 BY MR. MURPHY: 7 Q Good morning, Mr. Nordland. How are you? 8 A Fine. Thank you. 9 Q Is it okay if I call you Bill today? 10 A You may. 11 Q All right. Bill, have you ever -- I asked you 12 this off the record, before the record: Have you 13 ever been in a deposition before? 14 A I have not. 15 Q Okay. So we have the court reporter taking down 16 everything that we're saying. We have opposing 17 counsel, who may lodge objections from time to 18 time. I'll be asking you most of the questions 19 today. I don't know if Attorney Wittenberg 20 intends to ask questions. At the end of this, she 21 may; she may not. But I think safe to assume, 22 principally, I'll be asking the questions. Okay? 23 A Okay. 24 Q There's no need to be nervous or concerned about 25 this process. If you need to take a break, just</p>
<p style="text-align: right;">Page 2</p> <p>1 A P P E A R A N C E S 2 3 REINHART BOERNER VAN DEUREN S.C., by 4 Mr. Daniel G. Murphy, 5 1000 North Water Street, Suite 1700, 6 Milwaukee, Wisconsin 53202, 7 appeared on behalf of the Plaintiff. 8 REINHART BOERNER VAN DEUREN S.C., by 9 Mr. David G. Palay, 10 22 East Mifflin Street, Suite 700, 11 Madison, Wisconsin 53703, 12 appeared via Zoom videoconference on behalf 13 of the Plaintiff. 14 15 O'NEIL, CANNON, HOLLMAN, DeJONG & LAING S.C., by 16 Ms. Christa D. Wittenberg, 17 111 East Wisconsin Avenue, Suite 1400, 18 Milwaukee, Wisconsin 53202, 19 appeared on behalf of the Defendants. 20 21 22 23 I N D E X 24 25 Examination: Page By Mr. Murphy..... 3 Exhibit Identified: Page Exhibit 1 Defendants' Supplemental Rule 26(a)(1) Disclosures and Rule 26(a)(2) Disclosures..... 45 (The exhibit was attached to the original transcript, and copies were provided to counsel) (The original transcript was filed with Attorney Daniel G. Murphy)</p>	<p style="text-align: right;">Page 4</p> <p>1 let me know. This is going to be relaxed. It 2 shouldn't take all that long. We've committed to 3 a three-hour limit, in any event, and I don't 4 think we're going to butt up against that. I 5 suppose it depends on what we end up finding out, 6 but that's kind of the plan here. 7 One of the key rules today is I will do my 8 best to not speak over you, and please try to do 9 the same. Okay? 10 A Okay. 11 Q I tend to trail in my questions, and I will try to 12 make it obvious when I've come to a stopping point 13 so that you know that it's your turn to talk. 14 Okay? 15 A Okay. 16 Q Another key rule is is if I say anything -- 17 whether it's part of a question or just a name or 18 a term -- that you don't understand, please ask 19 me to clarify. Okay? 20 A I will. 21 Q Because, if you answer, I'm going to assume that 22 you understood what I said. Okay? 23 A Mm-hmm. 24 Q Other rule is you've got to vocalize your 25 responses. The record will reflect something like</p>

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<p style="text-align: right;">Page 5</p> <p>1 "mm-hmm" or "uh-uh," but it's not clear what that 2 means when we're looking back at this. Because, 3 at the end of the day, really all that matters is 4 what's on the written page. We're not recording 5 this. There won't be a video version of this. 6 So please make sure "yes," "no," verbal 7 answers. Okay? 8 A Understood. 9 Q Thank you. Are you under the influence of any 10 drugs or have any recent medical procedures, 11 anything that would cause you to not be able to 12 testify today? 13 A I am not. 14 Q Okay. I already talked about breaks, but again, 15 if you need a break at any time, just let me know. 16 So, just starting with some basic information, can 17 you state and spell your name for the record. 18 A Spell my name? 19 Q Yes. 20 A William, W-i-l-l-i-a-m, Nordland, N-o-r-d-l-a-n-d, 21 middle initial B as in boy. 22 Q And where do you live? 23 A 40402 N. South Newport Drive, Antioch, Illinois 24 60002. 25 Q What do you do for a living?</p>	<p style="text-align: right;">Page 7</p> <p>1 A Yes. 2 Q Who was that? 3 A I talked to Christa. 4 Q Okay. 5 A And my wife and my family. 6 Q Okay. Did you talk to Reed Widen? 7 A Yes. 8 Q Okay. And we're going to get into those 9 discussions in a moment. 10 Did you talk to anyone else outside of your 11 family other than Reed and Christa? 12 A Yes. I talked to Terry Vial. 13 Q Okay. 14 A And I talked to Ben Scharpf. 15 Q Okay. So let me make sure I got all this down. 16 Let's start with Christa. 17 How often did you talk -- or, excuse me. 18 How many times did you talk to Christa? 19 A I don't know for sure, but I'm going to say one, 20 regarding this deposition. 21 MR. MURPHY: I'm sorry. I keep 22 saying Christa. It's Chrissa? 23 MS. WITTENBERG: Christa. 24 MR. MURPHY: It is Christa. 25 MS. WITTENBERG: You're right,</p>
<p style="text-align: right;">Page 6</p> <p>1 A I am in contract sales management for Staples. 2 Q I don't need an in-depth analysis of what that job 3 entails, but can you just give me a little bit 4 of -- 5 A It's not an easy answer. We have a division 6 that's called the Staples Business Advantage 7 division of Staples that works on large enterprise 8 customers with, you know, contract sales. 9 So the customer signs a contract with us for 10 X amount of time to sell them certain product 11 lines. I'm responsible for a group of those 12 customers, to grow them, make them profitable, 13 keep them, renew them, enterprise contract sales. 14 Q Understood. Are you assigned to a specific 15 region? 16 A Yes. 17 Q What is that? 18 A The midwest region. 19 Q Okay. Did you ever have Widen Enterprises as a 20 customer? 21 A No. 22 Q Okay. All right. Just briefly, I would like to 23 touch on what you did to prepare for today, if 24 anything. Did you talk to anybody about your 25 deposition today?</p>	<p style="text-align: right;">Page 8</p> <p>1 mm-hmm. 2 Q Okay. So when -- I'm sorry. I got distracted. 3 You said you talked to Christa how many times? 4 A Once. 5 Q Once. How did you do so? Was it over the phone, 6 text, email? 7 A Over the phone. 8 Q Okay. About how long was that? 9 A Was the conversation? 10 Q Yeah. 11 A I can't say for sure, but less than 15 minutes. 12 Q Okay. What did you talk about? 13 A Just making her aware that I had been served and 14 that I was going to be here, and my intention was 15 to be here on time based on that, you know, 16 command on this document right here. 17 Q And you nailed that part. You were a half hour 18 early; right? 19 A Yes. 20 Q Did you talk about any of the substance of what 21 your testimony today might be? 22 A No. 23 Q Any of the issues in this case? 24 A Can you clarify that question. 25 Q Sure. So we're here -- I suppose I should have</p>

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<p style="text-align: right;">Page 9</p> <p>1 opened with that.</p> <p>2 We're here as part of a lawsuit that</p> <p>3 Stacy Randall, my firm's client, has filed against</p> <p>4 Reed Widen and others. And the case, in very</p> <p>5 broad strokes, deals with the redemption of my</p> <p>6 client's ownership interest or stock in</p> <p>7 Widen Enterprises -- or, excuse me, the stock is</p> <p>8 with Windy Waters, but in any event, her stock</p> <p>9 in the company and then a subsequent sale of the</p> <p>10 company.</p> <p>11 Were you aware of the nature of this lawsuit</p> <p>12 before you received the subpoena?</p> <p>13 A Yes.</p> <p>14 Q Okay. And did you discuss any of those topics, in</p> <p>15 a very broad umbrella, with Christa?</p> <p>16 A In what the lawsuit's about?</p> <p>17 Q Correct. What I would imagine, if a witness such</p> <p>18 as yourself had contacted me, you might have asked</p> <p>19 questions about what specific information the</p> <p>20 questioner would want to know, right.</p> <p>21 Did you ask those types of questions of</p> <p>22 Christa?</p> <p>23 A I -- not specifically. I just said what should I</p> <p>24 be prepared to answer, you know. I asked for how</p> <p>25 long we thought it was going to take. That was</p>	<p style="text-align: right;">Page 11</p> <p>1 exact date, but since I think we all were served</p> <p>2 somewhere around the same time, he became --</p> <p>3 understanding that I had been served as well, he</p> <p>4 called me and said, When are you going?</p> <p>5 I told him I was coming today. He told me he</p> <p>6 was going tomorrow, and that was about it, just</p> <p>7 really that, you know, Are you involved? Yes, I'm</p> <p>8 going on Thursday. Yes, I'm going on Friday. And</p> <p>9 didn't know what we could do, but we're here to</p> <p>10 answer whatever we can.</p> <p>11 Q Okay. And I appreciate you coming here, by the</p> <p>12 way. I realize that it's a bit of a drive for</p> <p>13 you, and we appreciate it.</p> <p>14 Similar questions with respect to Terry. You</p> <p>15 guys didn't get into what you might be asked or</p> <p>16 what you might answer?</p> <p>17 A No.</p> <p>18 Q Okay. And I believe you said Ben. And can you</p> <p>19 help me with the pronunciation of the last name?</p> <p>20 A It's Scharpf.</p> <p>21 Q Scharpf. So the P is, roughly, silent.</p> <p>22 A Yes. The -- yeah.</p> <p>23 Q Okay. Go ahead.</p> <p>24 A Very similar conversation as Terry.</p> <p>25 He called me. I understand you're going.</p>
<p style="text-align: right;">Page 10</p> <p>1 really about the extent of it.</p> <p>2 Q Okay. In terms of what you should be prepared to</p> <p>3 answer, do you recall what Christa told you?</p> <p>4 A That -- to be prepared to answer anything that I</p> <p>5 know regarding the topics related to the lawsuit;</p> <p>6 in other words, the -- Stacy suing Reed about her</p> <p>7 sale of the -- her shares in the company and, you</p> <p>8 know, the related topics surrounding that. I</p> <p>9 mean, it was really just to make sure I was under</p> <p>10 the -- under the full understanding of what the</p> <p>11 lawsuit was about.</p> <p>12 Q Okay. What about your conversation with Reed?</p> <p>13 A I just let him know that I had been served and</p> <p>14 that I was coming up this morning to have a</p> <p>15 deposition. That was the extent of our</p> <p>16 conversation.</p> <p>17 Q When did you have that conversation?</p> <p>18 A The day that I received that, which was</p> <p>19 December 23rd.</p> <p>20 Q Did you have any similar discussion about the</p> <p>21 nature of the case or what you should be prepared</p> <p>22 to answer with Reed?</p> <p>23 A No. No.</p> <p>24 Q Okay. What about Terry?</p> <p>25 A Terry called me. I can't -- I don't know the</p>	<p style="text-align: right;">Page 12</p> <p>1 Yes, when are you going? I'm going Thursday. He</p> <p>2 said he was going Friday. Talked for five</p> <p>3 minutes, maybe. Just, again, same topic: We're</p> <p>4 not sure what we can provide, but we're here to</p> <p>5 provide whatever we can.</p> <p>6 Q And that's what we're here to find out.</p> <p>7 A Yeah.</p> <p>8 Q Okay. So of those folks, it sounds like with no</p> <p>9 one, with perhaps the exception of Christa, did</p> <p>10 you get into the substance of what this deposition</p> <p>11 would entail?</p> <p>12 A Correct.</p> <p>13 Q And with respect to Christa, that conversation was</p> <p>14 limited to what you should be expected to discuss,</p> <p>15 not the nature of your answers?</p> <p>16 A Absolutely.</p> <p>17 Q Okay. Have you, prior to receiving your</p> <p>18 subpoena, had any discussions with anyone</p> <p>19 regarding this case?</p> <p>20 A Yes.</p> <p>21 Q And let's figure out who that is.</p> <p>22 A Reed made me aware of the lawsuit; his wife,</p> <p>23 Leanne. And those are the two, really, primary</p> <p>24 ones that made me aware of it and made me</p> <p>25 understand that there was a lawsuit going on.</p>

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<p>1 Q Okay. I'm just going to rattle off some other 2 folks you may have talked to -- 3 A Sure. 4 Q -- to confirm. Justin Randall? 5 A No. 6 Q Stacy Randall? 7 A No. 8 Q Okay. Any of the other witnesses that we just 9 talked about: Ben, Terry? 10 A Make sure I'm clarifying the question before I 11 answer that. So that we talked about the lawsuit 12 with those two people prior to this, no. 13 Q You got it. 14 A Not Ben or Terry. 15 Q Okay. So, as far as you recall, it would just be 16 Reed and Leanne in terms of anyone prior to 17 receiving a subpoena? 18 A Yes. 19 Q And we've covered everybody that you've talked to 20 subsequent to receiving the subpoena? 21 A Yes. 22 Q All right. When you talked to Reed about the 23 lawsuit, you said that Reed told you about the 24 lawsuit. What did Reed tell you? 25 A Reed told me that Stacy, his sister, had filed</p>	<p>1 Q Formally filed, I suppose. There may have been -- 2 A It makes sense that it would be after that date. 3 Q Okay. 4 A In my head. 5 Q And does it feel like it would have been that long 6 ago, like over a year ago, or is it more recent 7 than that? 8 A It feels like it would have been about that time. 9 Q Okay. Was the discussion with Reed at the same 10 time or the same discussion as the one with 11 Leanne? 12 A No. 13 Q Okay. So separately you spoke to Leanne about 14 the lawsuit? 15 A Yes. 16 Q And what did Leanne say, as best as you recall? 17 A Again, I don't recall the conversation 18 specifically. 19 Q Sure. 20 A Right. Just that it was going on, and they were 21 working on, you know, making it -- going through 22 the whole process. 23 Q And, presumably, they were expressing frustration 24 about that process? 25 A I would say, again, they were very surprised that</p>
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<p>1 suit with, you know -- filed suit with him, 2 against him, regarding the -- you know, the value 3 of -- of what she had collected prior to the sale 4 versus what the sale was worth and that she said 5 she was due -- she was suing for more than what 6 she had received once upon a time. 7 Q Did Reed offer any characterization of his view of 8 those claims? 9 A No. 10 Q Reed didn't say that this is all bullshit or 11 Stacy's, you know, out of line, anything like 12 that? 13 A I think it would be safe to say Reed was 14 surprised. 15 Q Okay. And when you say he was surprised, what did 16 he say to you that made you think that? 17 A I don't recall exactly what the exact conversation 18 was. I mean, I'd be -- what's the term I'm 19 looking for? I don't remember the exact 20 conversation. 21 Q That's fine. And forgive me if you already said 22 this, do you recall roughly when this conversation 23 was? And maybe I can help you out a little bit. 24 The lawsuit was filed in July of 2022. 25 A Okay.</p>	<p>1 it was going on in the first place. 2 Q Okay. Other than Reed and Leanne, you haven't 3 spoken to anybody about the lawsuit other than the 4 individuals we talked about in the context of our 5 discussion about the subpoena and today's 6 deposition. Those are the only two that you 7 recall? 8 A As it relates to this; right? 9 Q Correct. 10 A Correct. 11 Q Okay. Do you have any relationships with -- and 12 maybe this is too broad a question, so help me 13 out -- with anybody else at Widen or -- 14 A Well, I know the kids. And Reed's son Jesse 15 worked at Widen, so I've known him since he was a 16 baby. I don't think he's there anymore, but he 17 was at Widen for -- in a capacity, for a few 18 years, at least. 19 Q Okay. 20 A I've known Terry Vial for quite a while because 21 we're just common friends with Reed. 22 Q Okay. 23 A And they were neighbors and social friends. I 24 mean, when we would do something together, it 25 wasn't unusual that Terry and I were involved on</p>

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<p style="text-align: right;">Page 17</p> <p>1 a fishing trip or some type of a social event. 2 So I've known Terry for a long time. 3 Q Okay. 4 A I have met some of the folks at Widen that are 5 still there and in capacities, but I can't say 6 that I know them. I don't know that I would -- I 7 wouldn't be able to pick them out of a lineup. 8 Q Okay. Of those folks that you've met but, 9 presumably, more along the lines of an 10 acquaintance, not a friend, do you know 11 Matthew Gonnering? 12 A I've met Matthew. But, again, it was at an event. 13 How you doing, nice to meet you. 14 Q Okay. 15 A But we've never spent any real time together. 16 Q And same with respect to Michael Kiesler? 17 A I don't know that I've ever met Mike Kiesler. 18 Q But, by your answer, it sounds like you're 19 familiar with the name? 20 A I am. 21 Q Okay. And in what context would you be familiar 22 with that? 23 A In the context that Reed spoke about his 24 leadership team. 25 Q Okay.</p>	<p style="text-align: right;">Page 19</p> <p>1 anything beyond an oral conversation about this 2 case? 3 A No. 4 Q Okay. What about anything in writing? And, 5 again, what I would envision would be, most likely 6 in your scenario, would be something like a text 7 or an email, but please treat this as broadly as 8 you can imagine in terms of what you might have, 9 but anything related to Stacy? 10 A No. 11 Q Okay. Anything related to the sale of 12 Widen Enterprises? 13 A No. 14 Q Okay. And, after we leave here today, you may 15 receive a subpoena for documents from me, and 16 I'm understanding your answers and I understand 17 your response to that subpoena may be that you 18 have nothing. 19 When you receive that, if you receive it, if 20 you have any questions, please contact me, but 21 those are the types of information I'd ask you to 22 look for, confirm that what you've said today is 23 accurate, and then we can be done with that. 24 A Okay. Understood. 25 Q Just mainly giving you a heads-up about that</p>
<p style="text-align: right;">Page 18</p> <p>1 A And I -- and that name was mentioned. 2 Q Okay. Any other names that stick out? Again, I 3 understand you have limited contact with these 4 people, but I'm just trying to get a sense of your 5 familiarity with -- 6 A Yeah. No. 7 Q Okay. It seems as if your connection to this 8 case, to Widen Enterprises in general, is through 9 Reed. Is that a fair statement? 10 A It appears to be, yes. 11 Q My point being that you don't have separate 12 connections with Terry, with Jesse, with other 13 folks we've been discussing, other than that you 14 have interacted with them at times when you're 15 otherwise interacting with Reed? 16 A That is correct, social relationships, you know. 17 And the kids are the kids. We've just known the 18 kids since we were young, so -- since they were 19 young. 20 Q We talked about any communications that you had 21 with people about this case, about the subpoena. 22 Have you exchanged anything in writing with 23 any of the people that we've talked about related 24 to these topics, whether email, text, voicemail? 25 I guess voicemail wouldn't be writing, but</p>	<p style="text-align: right;">Page 20</p> <p>1 because that may be coming. Okay. 2 So let's talk about your relationship with 3 Reed. How did that begin? Where did you meet 4 him? 5 A Reed's family and my family both had a summer home 6 in northern Wisconsin: Boulder Junction, 7 Wisconsin. 8 Q Okay. 9 A A lake on the Manitowish Waters chain. 10 Q Okay. 11 A His place was built several years before ours went 12 up. But we met in two fishing boats, 10, 11 years 13 old maybe, as kids that wound up fishing in the 14 same little general area. We struck up a 15 conversation, and that's how we met. 16 Q Okay. So fair to say you're lifelong friends? 17 A We've known each other for a long, long time, yes. 18 Q Sure. So you're based in Illinois now. Were you 19 previously based in Wisconsin, or were you always 20 down there? 21 A Always in Illinois. 22 Q Okay. Just had the summer home or cottage -- 23 A We had the summer home. I was born and raised in 24 Illinois. I went to school in Arizona, but other 25 than that, have lived in -- lived in -- my</p>

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<p style="text-align: right;">Page 21</p> <p>1 residence has been in Illinois my whole life.</p> <p>2 But, yes, when we were kids, we spent several</p> <p>3 months up there, summers, up into and including</p> <p>4 some portion of high school. And then it depleted</p> <p>5 its time up there quite a bit because of college</p> <p>6 and so forth.</p> <p>7 Q That tends to happen, unfortunately.</p> <p>8 A Yes.</p> <p>9 Q So I would imagine your context in developing that</p> <p>10 relationship with Reed was limited to your time up</p> <p>11 north?</p> <p>12 A Fun, yes.</p> <p>13 Q Yeah, in those early years. As you mentioned, at</p> <p>14 some point, it sounds like you stopped going up</p> <p>15 there so often.</p> <p>16 How did you and Reed kind of stay in contact</p> <p>17 over the years, or what would be the context in</p> <p>18 which you would get together?</p> <p>19 A Yeah, I can answer that. We lost touch in --</p> <p>20 during the college years, I'll say. So I can't</p> <p>21 say for sure the age but roughly right around</p> <p>22 20 years old, we -- he went one way; I went</p> <p>23 another way. Two different schools, two different</p> <p>24 paths. So there were -- there was a period of</p> <p>25 time there that we weren't in touch.</p>	<p style="text-align: right;">Page 23</p> <p>1 it's transitioned into a different scenario.</p> <p>2 Q Okay.</p> <p>3 A So I still go. It's just not very often.</p> <p>4 Q You said a few times a year: three or four, two or</p> <p>5 three?</p> <p>6 A I probably -- I mean, I can't say for sure, but</p> <p>7 it's not more than, I would say, four to five.</p> <p>8 Q Okay.</p> <p>9 A On average.</p> <p>10 Q Sure. And outside of the trips up north, where</p> <p>11 else would you hang out with Reed?</p> <p>12 A I visited him in Arizona, his place in Arizona.</p> <p>13 Q Okay. Have you ever gone on hunting or fishing</p> <p>14 trips with him?</p> <p>15 A Yes.</p> <p>16 Q And my understanding -- limited, so help me out</p> <p>17 here -- but I think many of those trips are up to</p> <p>18 Canada?</p> <p>19 A I have been to Canada, hunting with him, twice.</p> <p>20 Q Okay.</p> <p>21 A Which is always a fall trip. And then I have been</p> <p>22 fishing with him in Canada once, and that was a</p> <p>23 spring trip.</p> <p>24 Q And so not once on a repeating basis, once period?</p> <p>25 A Once period.</p>
<p style="text-align: right;">Page 22</p> <p>1 I lived in Arizona, met my fiancé there. We</p> <p>2 moved back here to get married and to move back to</p> <p>3 the Chicago area. Went back up to the family</p> <p>4 place. We literally ran across people -- I ran</p> <p>5 across him going across the lake in his boat. We</p> <p>6 kind of said, Oh, my God, and that rekindled,</p> <p>7 restarted the relationship, what I would call the</p> <p>8 adult component --</p> <p>9 Q Okay.</p> <p>10 A -- of that relationship.</p> <p>11 Q So a period of disconnect throughout the college</p> <p>12 years and kind of early stages of family life but</p> <p>13 reconnected up north.</p> <p>14 About when would that have been? Is that --</p> <p>15 A That would have been around 1985.</p> <p>16 Q Okay. And so from 1985 to today, what's the</p> <p>17 nature of your relationship with Reed?</p> <p>18 A We -- we talk occasionally, just catching up --</p> <p>19 How you doing? -- on the phone. And then we get</p> <p>20 together a few times a year. Once in a while,</p> <p>21 it's up north. I don't go very often anymore,</p> <p>22 but occasionally I do.</p> <p>23 Q Do you still have the place up there?</p> <p>24 A My brother owns it now. My parents owned it. It</p> <p>25 was a family place, and my brother owns it now; so</p>	<p style="text-align: right;">Page 24</p> <p>1 Q And same with respect to the hunting, twice</p> <p>2 period?</p> <p>3 A Yes, sir.</p> <p>4 Q Okay. And on those trips, would Reed typically</p> <p>5 foot the bill?</p> <p>6 A No.</p> <p>7 Q No?</p> <p>8 A Well, I mean, let me take that over.</p> <p>9 Q Sure.</p> <p>10 A The hunting trips I paid for, for my share. It</p> <p>11 was a group amount, and then we divvied it up</p> <p>12 based on who was there, and I paid that portion of</p> <p>13 it.</p> <p>14 Q Okay.</p> <p>15 A I -- the one fishing trip I went with, he did foot</p> <p>16 the bill for that, with the exception of the</p> <p>17 gratuities and things like that that were above</p> <p>18 the cost of the trip.</p> <p>19 Q Okay. Are there any other circumstances like</p> <p>20 that, whether specifically hunting or fishing, but</p> <p>21 other instances where Reed is covering most of the</p> <p>22 cost of a trip? That you're involved in. I</p> <p>23 should say that.</p> <p>24 A Not that I can -- not that I can recall --</p> <p>25 Q Okay.</p>

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<p style="text-align: right;">Page 25</p> <p>1 A -- have been, no. I don't travel with him that 2 much, so . . . 3 Q Okay. How often -- you know, you say, I think it 4 was, a maximum four or five times a year. I'm not 5 trying to get hyperspecific about that data point. 6 How many -- well, let me just say it this 7 way: How many times a year, if that's the best 8 measure, are you out to Arizona, to visit him? 9 A Once or twice. 10 Q Okay. 11 A And I'll give you the example. Once -- we went 12 once -- with my wife to go visit them for a 13 vacation. Typically, it's once a year. It's only 14 been a couple years, but once a year for that. 15 Q Okay. 16 A There was a time when Reed had some surgery, and 17 I went out to help him recover. 18 Q Okay. 19 A So that was -- actually, that might have been the 20 only time that year too, but no more than -- it's 21 usually annually. 22 Q Okay. 23 A But no more than twice in any given year. 24 Q Okay. And I don't need the details of his surgery 25 or what your help consisted of, but fair to say,</p>	<p style="text-align: right;">Page 27</p> <p>1 A Yeah. 2 Q And is Reed's place in Scottsdale -- 3 A Yes. 4 Q -- I believe? Okay. I was just trying to get a 5 sense of, if you were going out there to visit 6 other folks you may know, might you bump into 7 Reed? 8 A I don't know. 9 Q Has that happened? Better way to ask that. 10 A Have I gone to Arizona to visit other people and 11 bumped into Reed? 12 Q Correct. 13 A Not that I -- not that I can think of. 14 Q Okay. We touched on this a bit, but I want to 15 circle back to it. 16 My understanding is your knowledge, your 17 awareness of Widen Enterprises or Windy Waters, 18 would be principally through discussions with 19 Reed? 20 A Yes. 21 Q And we talked about how you don't have any 22 business relationship with either of those 23 entities; correct? 24 A That's correct. 25 Q Okay. Did you ever talk to Reed about his</p>
<p style="text-align: right;">Page 26</p> <p>1 it sounds like, he trusted and relied on you? 2 You know, I wouldn't pick somebody out of my 3 friend group who I didn't trust and rely on to 4 help me out in that circumstance. 5 A I don't know, but you would -- you would think so. 6 I can't answer for him, but -- 7 Q Sure. 8 A Sure. 9 Q All right. You said that the trips to Arizona are 10 roughly annually. How far back would those go? 11 Like, do you recall the first time you went out to 12 Arizona? 13 A Mm-hmm. It was the first time that -- I mean, 14 again, we've lived in Arizona; so I've been out 15 there a lot. 16 Q Sure. 17 A The first time I visited him in Arizona was in the 18 spring of 2020. 19 Q Where did you live when you lived in Arizona? 20 A Where did I live when I lived in Arizona? 21 Q Correct. 22 A I lived in -- around campus: Tempe, Scottsdale, 23 Phoenix. Seven places in four years, college 24 life. 25 Q That's right. I recall it.</p>	<p style="text-align: right;">Page 28</p> <p>1 business? 2 A Yes. 3 Q Can you give me a sense of what you might talk 4 about. 5 A Well, that's going back a long -- a long way. 6 Q Sure. 7 A I mean, we talked, years ago, when it was a 8 prepress company, about how we were both working 9 very hard then, in terms of like daily driving, 10 spending a lot of time on the road. You know, we 11 were both developing our careers; so we talked a 12 lot about how we were getting better at what we 13 were doing. You know, this is in our -- I guess 14 I would call it our 30s. 15 Q Okay. 16 A So that was more on what we were doing on our 17 activity related to the company than -- but, as I 18 understand it, it was a prepress company, which I 19 can't pretend to understand. It seems to be 20 something that people make to put stuff on paper. 21 I recall that transitioning to going to some 22 on-demand print at some point in time for the -- 23 you know, as the company evolved, as -- you know, 24 his father was still involved. He and his 25 brothers were still involved in the company at</p>

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<p style="text-align: right;">Page 29</p> <p>1 that point in time.</p> <p>2 And then I recognized that it shifted towards</p> <p>3 the -- oh, what do they call it? -- digital asset</p> <p>4 management, what I first heard as intellectual</p> <p>5 property management. I, again, don't pretend to</p> <p>6 understand what that means. I kind of think I</p> <p>7 sort of -- but I -- I remember really</p> <p>8 specifically -- not specifically, but three things</p> <p>9 that come up in my brain are those three</p> <p>10 components of what I talked to him -- him about as</p> <p>11 far as the company's transition and evolution.</p> <p>12 Q Okay. So did you -- and I guess I'm more so</p> <p>13 concerned about at the point that the company is</p> <p>14 in kind of that last iteration, where it was over</p> <p>15 the past, you know, five to ten years, I suppose.</p> <p>16 Did you ever discuss the value of the</p> <p>17 company, what Reed might have thought it was</p> <p>18 worth?</p> <p>19 A No.</p> <p>20 Q Did you ever discuss whether Reed had been</p> <p>21 approached by other companies looking to acquire</p> <p>22 his company or equity firms looking to acquire</p> <p>23 his company?</p> <p>24 A Yes.</p> <p>25 Q How did that conversation -- to the best of your</p>	<p style="text-align: right;">Page 31</p> <p>1 Q Is that the only discussion that you've had with</p> <p>2 Reed related to another business acquiring the</p> <p>3 company?</p> <p>4 A I mean, that's when I heard that it was</p> <p>5 potentially -- it was on the table, that there was</p> <p>6 a possibility of him selling the company.</p> <p>7 You know, I kind of sat back and waited to</p> <p>8 see if that was something that was going to come</p> <p>9 to fruition. Again, we speak occasionally. But</p> <p>10 the next time it really made -- that it really</p> <p>11 comes to mind was, you know, after the sale,</p> <p>12 which was several months after that initial</p> <p>13 conversation.</p> <p>14 Q And after the sale, what was the nature of that</p> <p>15 discussion?</p> <p>16 A He said he sold the company and . . .</p> <p>17 Q And did you talk about how much, what his plans</p> <p>18 are now, you know, what his work --</p> <p>19 A I can't tell you that I know how much his company</p> <p>20 sold for.</p> <p>21 Q Okay.</p> <p>22 A I don't -- I don't know the answer to that</p> <p>23 question. I have a guess, but I don't know what</p> <p>24 it was; so I'd be --</p> <p>25 Q What's your guess?</p>
<p style="text-align: right;">Page 30</p> <p>1 recollection, how did that conversation come</p> <p>2 about?</p> <p>3 A He brought that up when we were visiting in</p> <p>4 Arizona.</p> <p>5 Q Okay. And did he happen to share -- well, what do</p> <p>6 you recall of the conversation?</p> <p>7 A We were visiting in the pool. That there was --</p> <p>8 somebody had approached them or somebody in the</p> <p>9 company had said that there might be a reason</p> <p>10 to -- something that makes -- made him might want</p> <p>11 to sell, sell the business.</p> <p>12 Q Do you recall when that was, that visit?</p> <p>13 A It was in spring of 2021.</p> <p>14 Q Okay. And did you get down to any sort of</p> <p>15 specifics as to the value they were -- or, excuse</p> <p>16 me, the price they were offering to acquire the</p> <p>17 company?</p> <p>18 A He didn't have any idea what the value was going</p> <p>19 to be at that point in time. So, no, he didn't.</p> <p>20 Q He didn't mention a ballpark figure of what it</p> <p>21 might be?</p> <p>22 A No.</p> <p>23 Q Okay. Is that the only discussion like that that</p> <p>24 you've had with Reed?</p> <p>25 A I'm not sure I understand your question.</p>	<p style="text-align: right;">Page 32</p> <p>1 A I don't -- I mean, does it matter if I'm guessing?</p> <p>2 Q No, it doesn't. I mean, you know, there will be</p> <p>3 an objection at trial that you're speculating, but</p> <p>4 for today's purposes, that's perfectly fine.</p> <p>5 A I -- I would guess it was -- it was north of</p> <p>6 \$100 million.</p> <p>7 Q Okay. So the sale actually went through in August</p> <p>8 of 2021. Would that have been around the time</p> <p>9 that you had this discussion?</p> <p>10 A That makes sense.</p> <p>11 Q And the sale process was probably underway at the</p> <p>12 time that you had that initial discussion in</p> <p>13 spring of 2021. I'm representing that to you.</p> <p>14 I'm not asking to you accept it.</p> <p>15 But did that discussion -- we've covered it,</p> <p>16 but knowing that that's the timeline of the sale,</p> <p>17 did Reed mention that they were in active talks</p> <p>18 with that company? Were they, you know,</p> <p>19 proceeding towards a sale, or was -- go ahead.</p> <p>20 A I don't remember the details in terms of what --</p> <p>21 we didn't get into that level of detail when we</p> <p>22 talked about it. Reed and I are old-time, big --</p> <p>23 you know, big-picture friends, right. I would</p> <p>24 love to see him, you know, sell his company, just</p> <p>25 because I get to spend more time with him, you</p>

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<p>1 know, but it was -- he doesn't speak like that.</p> <p>2 It's, This is what we're going to go do. This is</p> <p>3 what I'm hoping to be able to do, and if it works</p> <p>4 out, great. And then we move to the next</p> <p>5 conversation. So we never got into any kind of --</p> <p>6 he just doesn't share details like that with</p> <p>7 somebody like me.</p> <p>8 Q Okay. Did he talk about -- again, I understand</p> <p>9 he's not getting into that level of detail. I'm</p> <p>10 going to keep asking questions about this --</p> <p>11 A Go ahead.</p> <p>12 Q -- just to see if I can jog your memory.</p> <p>13 A I'll tell you what I know.</p> <p>14 Q Did he talk about what he was doing with respect</p> <p>15 to was he hiring an investment banker? Was he</p> <p>16 working with any sort of outside consultant to</p> <p>17 make this process move forward?</p> <p>18 A I'm sorry. I don't know the answer to that</p> <p>19 question.</p> <p>20 Q Could have been; could not have been. Don't know?</p> <p>21 A Exactly. But I -- I don't -- I don't know.</p> <p>22 Q Okay. Did he ever talk to you -- you mentioned</p> <p>23 Jesse. Did he ever talk to you about succession</p> <p>24 planning? And I want to back away from the</p> <p>25 discussion we were just having about those two</p>	<p>1 Q Is that true?</p> <p>2 A I mean, the trips that I have gone on, was Justin</p> <p>3 with us?</p> <p>4 Q Correct.</p> <p>5 A Not on the fishing trip. Boy, I -- he may have</p> <p>6 been on one of the hunting trips, but I can't say</p> <p>7 for sure. Maybe. I don't remember.</p> <p>8 Q That's fair.</p> <p>9 A Entirely possible, but --</p> <p>10 Q Why are you --</p> <p>11 A -- I don't --</p> <p>12 Q Go ahead. Sorry.</p> <p>13 A I don't remember if he was on one of those trips</p> <p>14 or not. I'm sorry. I just don't remember.</p> <p>15 Q That's fine.</p> <p>16 A I can find out.</p> <p>17 Q Why are you confident he wasn't on the fishing</p> <p>18 trip?</p> <p>19 A The fishing trip was one of those trips you don't</p> <p>20 forget as a fisherman.</p> <p>21 Q Okay.</p> <p>22 A It was a bucket-lister. And I was his guest,</p> <p>23 Reed's guest, and we went with Reed's son Jesse</p> <p>24 and his son-in-law Cody as a foursome; so that</p> <p>25 would have been the four.</p>
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<p>1 specific conversations: the one in the spring of</p> <p>2 '21 and then the post-sale discussion.</p> <p>3 Did he ever talk to you about what might</p> <p>4 become of the business because or related to</p> <p>5 Jesse's or his kids' interest in the company?</p> <p>6 A As it relates to his kids' interest in the</p> <p>7 company, so if --</p> <p>8 Q Like, let me -- that's a poorly worded question.</p> <p>9 A Okay.</p> <p>10 Q Did he ever discuss succession planning with you?</p> <p>11 And I mean that not in a hypertechnical sense but</p> <p>12 just like what might become of the company when he</p> <p>13 was ready to retire.</p> <p>14 A No. When he was ready to retire, no. And when he</p> <p>15 sold it, there was no succession plan because he</p> <p>16 was selling it.</p> <p>17 Q Right. So I guess I'm curious if you ever had a</p> <p>18 discussion about the lack of a succession plan,</p> <p>19 meaning that he didn't have someone to pass the</p> <p>20 company off to?</p> <p>21 A No.</p> <p>22 Q Okay. All right. My understanding is that</p> <p>23 Justin Randall has participated in some of the</p> <p>24 same trips that we were talking about before.</p> <p>25 A Okay.</p>	<p>1 Q Where did you go? I know it was Canada, but --</p> <p>2 A It was a place in northern Saskatchewan.</p> <p>3 Q Okay. And, presumably, caught some great fish?</p> <p>4 A It was a great time. Very fun.</p> <p>5 Q Good. Okay. Do you know Justin outside of those</p> <p>6 trips? Have you hung out with Justin separately</p> <p>7 from that?</p> <p>8 A Yes.</p> <p>9 Q Okay. More than a handful of times?</p> <p>10 A So separately, just Justin and I, without Reed?</p> <p>11 Q No. Just my initial question was about the trips</p> <p>12 and whether Reed was involved or not. Have you</p> <p>13 hung out with Justin on more than a handful of</p> <p>14 occasions?</p> <p>15 A With other people. I want to make sure I'm</p> <p>16 answering your question correctly.</p> <p>17 Q Yeah.</p> <p>18 A So I've been with Justin a lot, but typically as</p> <p>19 in a family setting or a group setting.</p> <p>20 Q That's what I'm trying to ask.</p> <p>21 A So the answer is yes, then. Yes.</p> <p>22 Q Okay. And would you say that your relationship</p> <p>23 with Justin -- well, did it span a similar</p> <p>24 timeline as your relationship with Reed, or is it</p> <p>25 more recent?</p>

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<p>1 A It's certainly more recent because he wasn't born 2 yet. 3 Q Sure. 4 A So I would say it's -- remember we talked about 5 the first session of Bill and Reed and then the 6 second one, and there was the lapse in between. 7 It would be as part of the second session when I 8 became, you know, familiar with Justin. 9 Q Okay. And we need don't to walk back through all 10 of that, but kind of similar, that you would see 11 him up north in the summertimes? 12 A Correct. 13 Q And may have participated in a trip as well? 14 A To -- to what I remember, okay, is -- like, I 15 didn't go on those trips just because I -- I 16 couldn't afford to or for whatever reason, but 17 Reed used to take Justin and his late brother 18 Andrew on a lot of trips. I think that fishing 19 trip that I was referring to earlier was one of 20 them that he would bring them on. 21 Q Okay. 22 A But I didn't go on those. 23 Q Okay. 24 A But, yes, it was -- time with Justin was very 25 simple to represent: up north, in some type of a</p>	<p>1 Q Okay. Fair to say that that could have happened 2 and you don't recall? 3 A Yeah, I don't know. 4 Q Okay. 5 A I'm sorry. I just don't know. 6 Q When you were hanging out with Justin and Reed on 7 any of the occasions that we've just mentioned, do 8 you recall them discussing Widen Enterprises? 9 A No, I don't. 10 Q Okay. And, as you mentioned before, obviously, 11 you were not always with Justin and Reed when 12 those two are together? 13 A Correct. 14 Q So we talked about your conversation with Reed 15 after the sale. Was that when you learned of the 16 sale? 17 A That's when I learned of the sale. 18 Q From Reed was the first time you had heard of it? 19 A Yes. 20 Q Okay. And we talked about what you discussed. I 21 don't know if I established where you were or what 22 the context of that conversation was. 23 A I'm not -- I can't tell you where I was or how we 24 learned. If I -- I would guess it was a phone 25 call, but I'd be guessing if that was the case.</p>
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<p>1 group setting, winter/summer, snowmobiling and ice 2 fishing or, you know, up north in the summer, on 3 the beach or in the boats, and a lot of those. 4 Or in some type of a family event in the Madison 5 area, where they all live, typically at Reed's 6 place, not always, but typically at Reed and 7 Leanne's house, for a birthday or Christmas or a 8 party or something. 9 And then we -- when I visited Reed in 10 Arizona, we did see each other out there at least 11 once. Because they were staying someplace else, 12 and they visited us while we were there. 13 Q Okay. 14 A But we didn't -- Justin and I didn't really do 15 things independently. 16 Q Sure. Would you ever talk to Justin about the 17 company, about Widen? 18 A Not that I can recall. 19 Q Did you ever talk to Justin, as best as you 20 recall, about the conversation in spring of '21 21 that we talked about earlier that you had with 22 Reed in Arizona? 23 A Did I talk to Justin after I talked to Reed in 24 spring of '21 about the sale of the company, I -- 25 not that I can specifically recall.</p>	<p>1 I remember the first conversation because I 2 remember being together with him on the 3 it-might-happen conversation. But how I learned 4 about this sale, I can't say for sure. 5 Q Okay. Were you surprised to learn of the sale? 6 A Surprised, I'm not sure how to answer that, if I 7 was surprised. I was happy for him, but I'm 8 not -- I -- 9 Q So maybe not surprised? 10 A I'm not sure I could equate the answer to that. 11 I'm sorry. I don't know how to answer that 12 question about the word surprise. I guess 13 that's -- that could be interpreted in a couple 14 different ways. 15 Q Well, I mean, I guess the reason I ask it is you 16 said that, in the many years you've known Reed, 17 there was all of one conversation about him 18 selling the company. I would imagine that it 19 might be a surprise that that actually happened. 20 A It was -- it was -- I would describe it more as 21 happy for him. 22 Q Okay. 23 A As -- as -- I don't know how else to say it. 24 Like, I was happy to hear that he had done it. 25 Q Okay. Different topic. And, again, on breaks, we</p>


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<p>1 haven't quite yet been going an hour. I was 2 planning on taking a break at about an hour, but 3 if you need a break at any point, let me know. 4 A Okay. 5 Q What do you know about -- let me start it this 6 way: Have you ever met, hung out with, 7 Stacy Randall? 8 A Yes. 9 Q Similar context to what we were talking about with 10 Justin and Reed and being up north? 11 A Very, very similar. Now, I've known Stacy much 12 longer because I knew her in phase one. 13 Q Sure. 14 A I knew of her in phase one. I was -- knew who she 15 was. She didn't want much to do with the kids in 16 those days, but, yeah, we -- very similar: 17 parties, birthdays, Christmas up north. 18 Q Okay. 19 A Very -- it was very often that the group was all 20 together, and she was present in most of the 21 things that we did -- 22 Q Okay. 23 A -- as a -- as a group. 24 Q I would assume you were much closer with Reed than 25 you were or are with Stacy?</p>	<p>1 the way it was going on, I guess, is what I was 2 trying to say. 3 Q Okay. 4 A I didn't say there was a rift. 5 Q Sorry. I must have misheard. 6 At any point when the lawsuit was filed did 7 you get the impression that you should stop 8 having contact with Stacy? 9 A Did I get the impression. From? 10 Q Anyone. 11 A No. 12 Q Do you know enough about this lawsuit to know 13 whether -- to believe -- you know, we're going to 14 ask a jury to decide who's right and wrong here, 15 but -- 16 A Yep. 17 Q -- to believe that either Reed or Stacy is in the 18 right? 19 A Say that again. I'm sorry. 20 Q Do you know enough about the lawsuit, about what 21 occurred, to believe yourself, whether true or 22 not -- or, excuse me, whether correct or not, just 23 your belief, who is in the right -- 24 A Oh, God no. 25 Q -- Stacy or Reed?</p>
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<p>1 A Correct. 2 Q What do you think of Stacy? 3 A What do I think of Stacy? I don't really 4 necessarily have an opinion on what I would say 5 about her. I've been -- we've been friendly with 6 her for a long, long time, know her kids, spend a 7 lot of time with her, you know. 8 Q Like her? 9 A I like -- yeah, I like her. I'm a little 10 disappointed in what's going on with this, 11 honestly, but I'm -- yeah. 12 Q Why are you disappointed in what's going on with 13 this? 14 A Well, because I think it's causing some -- some 15 stress on the whole relationship, and I wish it 16 wouldn't. 17 Q And you think Stacy is causing that? 18 A Well, Stacy's filed the lawsuit; right? 19 Q So you think the lawsuit is what's causing the 20 rift? 21 A What rift? 22 Q I thought you said the lawsuit was causing a rift. 23 I must have misheard you. 24 A No. I said I like her. I wish this wasn't going 25 on so that that relationship could have continued</p>	<p>1 A No. 2 Q Okay. My understanding is that -- and correct me 3 if I'm wrong -- that, in the past, you've 4 participated in a fundraiser called Drew Fest. 5 Are you familiar with that? 6 A I'm familiar with Drew Fest. I -- did I 7 participate in Drew Fest? 8 Q In a broad sense, did you support it, contribute, 9 attend? 10 A I wrote a check. 11 Q Okay. And I guess you're distinguishing that 12 from attending? 13 A Correct. 14 Q Okay. How many times have you written a check to 15 Drew Fest? 16 A To my -- best of my knowledge, once. 17 Q Okay. When was that? 18 A This past year. 19 Q Okay. 20 A I'm not familiar that Drew Fest existed before 21 that. If it did, I am not familiar with that. 22 Q Okay. Did you ever talk to -- sorry. I skipped 23 ahead and failed to cover this. 24 In the context of your communications with 25 hanging out with Stacy, did you ever talk to her</p>

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<p style="text-align: right;">Page 45</p> <p>1 about Widen Enterprises, her role, her ownership, 2 anything like that? 3 A No. 4 Q Okay. 5 MR. MURPHY: I think I am going to 6 mark one exhibit here. 7 (Exhibit No. 1 was marked for 8 identification) 9 Q Bill, that's Exhibit 1, and I'll help you out 10 here. That's a filing in this case, and really 11 I'm not concerned with anything until you flip to 12 page 5. So what I'll tell you is this list that 13 continues on to page 5 -- and you see your name at 14 number 23; right? 15 A Yep. 16 Q Okay. 17 A It's not spelled correctly, but I see it. 18 Q Oh, right. I didn't even catch that. It should 19 be a-n-d; correct? 20 A That's right. 21 Q Is that your phone number? 22 A It is. 23 Q Okay. So this is why you're here today, in that 24 in this filing, Reed and the other defendants in 25 the case disclosed that you may have information</p>	<p style="text-align: right;">Page 47</p> <p>1 immediate questions and come back. 2 MS. WITTENBERG: No, why don't you 3 finish up. 4 MR. MURPHY: All right. Let's take 5 a five-to-ten-minute break. Come back a 6 little bit after 10:30. 7 (A recess is taken) 8 MR. MURPHY: I don't have any 9 further questions. Thank you very much, 10 Bill, for coming up today. 11 THE WITNESS: Thank you. 12 MS. WITTENBERG: Nothing for me. 13 14 (Proceedings concluded at 10:29 a.m.) 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 46</p> <p>1 relevant to this case, and that's why you're in 2 this list. 3 Is there anything that we haven't talked 4 about so far that you think is relevant to any of 5 the issues in this case? 6 A Not that I'm aware of. 7 Q Okay. And, specifically, they say that you may 8 have information about the existence and timing 9 of communication with Reed Widen or Justin Randall 10 related to any potential sale of 11 Widen Enterprises. 12 Anything that we've not covered -- and we 13 did talk about two communications related to the 14 sale; right? 15 A Yeah. 16 Q Anything we haven't covered that would fit into 17 that category? 18 A I think we've covered it pretty well, but no, not 19 that I can come up with. No. 20 Q Okay. 21 MR. MURPHY: I want to take a 22 break. I may be done, but I want to look 23 over my notes and hopefully get you out of 24 here shortly. 25 Christa, I can pass him if you have</p>	<p style="text-align: right;">Page 48</p> <p>1 STATE OF WISCONSIN) 2) SS: 3 COUNTY OF DANE) 4 5 I, Sheila K. Finnegan-Martinez, a Registered 6 Professional Reporter and Notary Public in and for 7 the State of Wisconsin, do hereby certify that the 8 foregoing deposition of WILLIAM B. NORDLAND was taken 9 by me on January 4, 2024, and reduced to writing by 10 me, a professional court reporter and disinterested 11 person, approved by all parties in interest and 12 thereafter converted to typewriting using 13 computer-aided transcription. 14 I further certify that I am not related to nor 15 an employee of counsel or any of the parties to the 16 action, nor am I in any way financially interested in 17 the outcome of this case. 18 IN WITNESS WHEREOF, I have hereunto set my hand 19 and affixed my notarial seal of office at Madison, 20 Wisconsin, this 5th day of January 2024. 21 22  23 Notary Public, State of Wisconsin 24 My Commission Expires May 3, 2027 25</p>

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